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19 United States of America

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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
v.
STUART WOLFF,
Defendant.

No. 17-cv-3482
[CR 05-0398-GAF]
**UNITED STATES OF AMERICA'S
APPLICATION FOR:**

(1) **WRIT OF CONTINUING
GARNISHMENT**
[28 U.S.C. § 3205(b)]
and
(2) **CLERK'S NOTICE OF
CONTINUING GARNISHMENT
TO DEBTOR**
[28 U.S.C. § 3202(b)]

[Charles Schwab & Co.; RGT Capital
Management; and TH Lee Putnam
Internet Partners, aka TH Lee Putnam
Ventures]

1 The United States of America applies, in accordance with 28 U.S.C. § 3205(b)(1),
2 for a Court Order Issuing a Writ of Continuing Garnishment in order to secure payment
3 on the criminal judgment entered in United States v. Stuart Wolff, CR 05-0398-GAF,
4 imposing restitution of \$11,900,462.35 and a special assessment in the amount of \$100
5 against the defendant-judgment debtor, Stuart Wolff, Social Security Number XXX-XX-
6 0984, c/o John F. Gibbons, Esq., Greenberg Traurig LLP, 77 West Wacker Drive, Suite
7 3100, Chicago, IL 60601. In connection with this request, the United States also
8 requests the Court to issue a Clerk's Notice of Continuing Garnishment to Debtor,
9 pursuant to 28 U.S.C. § 3202(b), as prepared and submitted by the United States as an
10 attachment to this application.

11 As of May 1, 2017, Defendant's criminal debt balance is \$6,795,062.35.

12 Demand for payment of the above-stated debt was made upon Defendant more
13 than thirty (30) days before the date of this application, and Defendant has not paid the
14 amount due.

15 Garnishees are believed to owe or will owe, money or property to Defendant, or
16 are in possession of property (such as nonexempt disposable earnings) of Defendant, and
17 Defendant has a substantial nonexempt interest in the property.

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1 The names and addresses of Garnishees or the Garnishees' authorized agent are:

2 Charles Schwab & Co. 3 211 Main Street 4 San Francisco, CA 94105 5 Attn: Office of Corporate Counsel	6 RGT Capital Management 7 5950 Sherry Lane, Ste. 600 8 Dallas, TX 75225 9 Attn: Legal Department
10 TH Lee Putnam Internet Partners 11 aka TH Lee Putnam Ventures 12 1120 Avenue of the Americas, Ste. 1807 13 New York, NY 10036 14 Attn: Legal Department	15

16 DATED: May 9, 2017.

17 Respectfully submitted,

18 SANDRA R. BROWN
19 Acting United States Attorney
20 DOROTHY A. SCHOUTEN
21 Assistant United States Attorney
22 Chief, Civil Division
23 INDIRA J. CAMERON-BANKS
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25 Chief, Financial Litigation Section

26 /s/ Robert I. Lester
27 ROBERT I. LESTER
28 Assistant United States Attorney
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29 Attorneys for Plaintiff